

REMARKS

Claims 1, 9-13, 18, 19, 32 and 33 are pending in the present patent application. Claims 1, 9-13, 18, 19, 32 and 33 stand rejected and also stand objected to. By the present Amendment, claims 1, 9-13, 18, 19, 32 and 33 have been amended. This application continues to include claims 1, 9-13, 18, 19, 32 and 33.

Claims 1, 9-13, 18, 19, 32 and 33 were objected to because of informalities. Applicants have amended claims 1, 9-13, 18, 19, 32 and 33 in accordance with the Examiner's suggestions.

Accordingly, Applicants respectfully request that the Examiner withdraw the objection to claims 1, 9-13, 18, 19, 32 and 33.

Claims 1, 9-13, 18, 19, 32 and 33 were rejected under 35 U.S.C. §101 as assertedly lacking a practical application of a judicial exception for failure to produce a useful, concrete and tangible result.

Applicants respectfully request reconsideration of the rejection of claims 1, 9-13, 18, 19, 32 and 33 under 35 U.S.C. §101 for the reasons that follow.

35 U.S.C. §101 provides that a patent may be obtained for any new and useful process, machine, manufacture, or composition of matter, or any new and useful improvement thereof.

The claimed invention as a whole must be useful and accomplish a practical application. That is, it must produce a "useful, concrete and tangible result." *State Street Bank & Trust Company v. Signature Financial Group, Inc.*, 149 F.3d 1368, 47 USPQ2d 1596, (Fed. Cir. 1998), (MPEP 2106(II)(A)).

Applicants' claims are apparatus claims directed to a computer network and a network adapter, both of which are well known as producing useful, concrete and tangible results, and

which are well known to fall into at least the statutory “machine” category of patentable subject matter specified in 35 U.S.C. §101.

MPEP 2106(II)(A) also provides that the purpose of this requirement is to limit patent protection to inventions that possess a certain level of “real world” value, as opposed to subject matter that represents nothing more than an idea or concept, or is simply a starting point for future investigation or research (*Brenner v. Manson*, 383 U.S. 519, 528-36, 148 USPQ 689, 693-96 (Fed. Cir. 1966); *In re Fisher*, 421 F.3d 1365, 76 USPQ2d 1225 (Fed. Cir. 2005); *In re Ziegler*, 992 F.2d 1197, 1200-03, 26 USPQ2d 1600, 1603-06 (Fed. Cir. 1993)).

Applicants’ claims are apparatus claims which are directed to a computer network and a network adapter, and recite structure that yield computer networks and network adapters that have well known “real world” value, and are clearly not simply subject matter that represents nothing more than an idea or concept, or is simply a starting point for future investigation or research.

For example, in addition to the well recognized “real world” value of computer networks for use in information processing, and in network adapters which are known to connect computers and other devices to computer networks, Applicants’ invention of claims 1, 9-13, 18, 19, 32 and 33 further allows peripherals to be connected to a network, provides direct attachment of peripheral devices with flexibility in locating the devices, and allows the devices to be addressed by networked computers without powering-on a computer attached to the peripheral (see Applicants’ specification at page 3, lines 19-27).

Accordingly, Applicants respectfully submit that claims 1, 9-13, 18, 19, 32 and 33 are directed to subject matter that produces useful, concrete, and tangible results, and possesses a level of “real world” value in the form of a computer network and a network adapter, and are therefore directed to statutory subject matter under 35 U.S.C. §101.

Accordingly, Applicants respectfully request the Examiner to withdraw the rejection of claims 1, 9-13, 18, 19, 32 and 33 under 35 U.S.C. §101.

Claims 1, 9, 32 and 33 were rejected under 35 U.S.C. §103(a) as being unpatentable over Taylor, et al., U.S. Patent No. 5,764,693 (hereinafter, Taylor) in view of Laity, et al., U.S. Patent No. 6,697,892 B1 (hereinafter, Laity). Applicants respectfully request reconsideration of the rejection of claims 1, 9, 32 and 33 in view of the following.

Taylor is directed to a radio modem used to communicate between a host unit and a remote data processing or communications device, either directly or via a network through a data transmission/ reception network station (Col. 1, lines 22-49). Taylor discloses that the radio modem is designed to operate in a wireless data network that uses packet-switched communication (col. 2, lines 13-15). The radio modem may be configured (i) with an on-board microprocessor that provides overall control of the operation of the various subsystems of the radio modem (the "on-board processor form") or (ii) without an on-board processor, whereby the essential control functions that are performed by the microprocessor in the on-board processor form are performed by the host unit microprocessor (the "microprocessor-less form") (col. 2, lines 39-47).

Laity is directed to a port expansion system for connecting a single port, such as a USB port, on a host system such as a personal computer (PC) to various computer peripheral devices and functions (col. 1, lines 10-13). A power end module includes a connector for connection to an external power supply for powering the system in the event the system requires power above a predetermined level (col. 3, lines 25-28). A USB-to-single parallel port (IEEE-1284) module 18 has a parallel output port 42 connected to a printer 44, and a USB-to-Ethernet module 19 has an RJ-45 port 46 connected to an Ethernet LAN 48 (col. 5, lines 38-42).

Applicants believe that claims 1, 9, 32 and 33 patentably define Applicants' invention over Taylor and Laity, taken alone or in combination, for at least the reasons set forth below.

Claim 1 is directed to a computer network.

Claim 1 recites, in part, a microprocessorless network adapter interconnecting said at least one host computer and said at least one peripheral device.

Taylor and Laity, taken alone or in combination, do not disclose, teach, or suggest a microprocessorless network adapter interconnecting the at least one host computer and the at least one peripheral device, as recited in claim 1.

Taylor is relied upon as assertedly disclosing a microprocessorless network adapter interconnecting the at least one host computer and the at least one peripheral device in Fig. 3 and the passages at column 2, lines 39-47 and column 7 lines 7-16.

The Taylor radio modem, microprocessorless or not, is not a network adapter, and is not disclosed as decoding network protocols. Rather, it is known in the art that a radio modem is used to communicate with a base station, and it is the base station that connects to the network and decodes the network protocols. Rather than being a network adapter, the Taylor radio modem is simply an apparatus for communicating with other devices wirelessly, including a base station that may include a network adapter.

For example, Taylor explicitly discloses that the radio modem used to communicate between a host unit and a remote data processing or communications device, either directly or via a network through a data transmission/ reception network station (col. 1, lines 22-49).

Thus, Taylor makes clear that the radio modem communicates via a network through the base station, referred to in the Taylor discloses as a data transmission/ reception network station.

Although Taylor discloses that the radio modem may be microprocessorless (col. 2, lines 39-47 and col. 7, lines 7-16), nonetheless, the Taylor apparatus is clearly disclosed as being a radio modem, not a network adapter.

For example, Taylor discloses that Fig. 3 is a block diagram of the hardware layout for the microprocessor-less version of the radio modem using baseband modulation and an external interface to the host unit, such as a PCMCIA interface (col. 6, lines 4-7).

Fig. 3 clearly depicts components of a radio frequency (RF) digital signal processor (DSP) employing quadrature phase modulation and a host controlled transmit/receive (T/R) switch, such as one might expect in a radio modem.

However, it is noted that the radio modem Fig. 3 does not include any components or circuitry for decoding the network protocols associated with a computer network, and hence, is not a network adapter.

Rather, as set forth above, in contrast to a network adapter, the Taylor radio modem is simply an apparatus for communicating with other devices wirelessly, including a base station that may include a network adapter.

In addition, as set forth above, Taylor explicitly discloses that the radio modem may communicate via a network through the base station (data transmission/ reception network station).

Taylor does not disclose, teach, or suggest that the base station is microprocessorless.

Laity also does not disclose, teach, or suggest a microprocessorless network adapter interconnecting the at least one host computer and the at least one peripheral device, as recited in claim 1, nor is it asserted so in the rejection of claim 1.

Rather, Laity does not disclose, teach, or suggest a microprocessorless network adapter, and also does not disclose, teach, or suggest any network adapter interconnecting a host computer and a peripheral device.

Although Laity discloses a USB-to-single parallel port (IEEE-1284) module 18 having a parallel output port 42 connected to a printer 44, and a USB-to-Ethernet module 19 having an RJ-45 port 46 connected to an Ethernet LAN 48 (col. 5, lines 38-42, Fig. 1), Laity does not disclose, teach, or suggest a network adapter interconnecting a host computer and a peripheral device, as recited in claim 1.

For example, Laity does not disclose, teach, or suggest that USB-to-Ethernet module 19 is used to interconnect notebook computer 12 and printer 44.

Rather, Applicants respectfully submit that one skilled in the art would recognize that USB-to-Ethernet module 19 allows notebook computer 12 to access Ethernet LAN 48, and that USB-to-single parallel port (IEEE-1284) module 18 allows computer to access printer 44.

Also, Laity simply does not disclose, teach, or suggest that notebook computer 12 may access printer 44 via USB-to-Ethernet module 19, or that USB-to-Ethernet module 19 otherwise interconnects notebook computer 12 with printer 44.

Rather, USB-to-single parallel port (IEEE-1284) module 18, which is not a network adapter, interconnects notebook computer 12 and printer 44.

Accordingly, Taylor and Laity, taken alone or in combination, do not disclose, teach, or suggest a microprocessorless network adapter interconnecting the at least one host computer and the at least one peripheral device, as recited in claim 1.

Claim 1 also recites, in part, a USB hub interconnecting said at least one peripheral device and said microprocessorless network adapter.

Taylor does not disclose, teach, or suggest a USB hub interconnecting at least one peripheral device and a microprocessorless network adapter, as recited in claim 1, nor does the Examiner assert as much. Rather, Laity is relied on for this subject matter of claim 1.

In contrast to a USB hub interconnecting at least one peripheral device and a microprocessorless network adapter, as recited in claim 1, Laity discloses a port expansion system 10 for connecting a single port, such as a USB port, on a host system such as a personal computer (PC) to various computer peripheral devices and functions (col. 1, lines 10-13, Fig. 1).

Although Laity discloses a USB-to-single parallel port (IEEE-1284) module 18 having a parallel output port 42 connected to a printer 44, and a USB-to-Ethernet module 19 having an RJ-45 port 46 connected to an Ethernet LAN 48 (col. 5, lines 38-42, Fig. 1), Laity does not disclose, teach, or suggest a USB hub interconnecting at least one peripheral device and a microprocessorless network adapter.

Rather, Laity discloses that port expansion system 10 may connect an Ethernet LAN 48 to notebook computer 12 and may also connect a printer 44 to notebook computer 12.

However, Laity does not in any manner disclose, teach, or suggest that port expansion system 10 or USB-to-single parallel port (IEEE-1284) module 18 connects printer 44 to USB-to-Ethernet module 19 or to Ethernet LAN 48.

Accordingly, Taylor and Laity, taken alone or in combination, do not disclose, teach, or suggest a USB hub interconnecting at least one peripheral device and a microprocessorless network adapter, as recited in claim 1.

Accordingly, for at least the reasons set forth above, Taylor and Laity, taken alone or in combination, do not disclose, teach, or suggest the subject matter of claim 1.

Claim 1 is thus believed allowable in its present form.

Claim 9 is directed to a computer network, and recites, in part, a microprocessorless network adapter interconnecting said at least one host computer and said at least one peripheral device.

Taylor and Laity, taken alone or in combination, do not disclose, teach, or suggest a microprocessorless network adapter interconnecting the at least one host computer and the at least one peripheral device for substantially the same reasons as set forth above with respect to claim 1.

Claim 9 also recites wherein said microprocessorless network adapter is configured to manage power on said at least one peripheral device.

Taylor does not disclose, teach, or suggest wherein a microprocessorless network adapter is configured to manage power on at least one peripheral device, nor is it asserted as much.

Laity also does not disclose, teach, or suggest a wherein a network adapter, much less a microprocessorless network adapter, is configured to manage power on at least one peripheral device.

Rather, Laity discloses that the hub end module is capable of supplying to each downstream USB port 500 mA for up to seven (7) low-power or high-power device class functions (col. 8, lines 57-60).

Applicants respectfully submit that supplying or providing power does not in any manner disclose, teach, or suggest managing power on a peripheral device, as recited in claim 9. For example, by analogy, it is well known in the art that plugging a common electrical appliance into a wall socket to provide electrical power to the appliance does not constitute managing power on the appliance. Rather, supplying power to a device simply does not disclose, teach, or suggest in any manner managing power in the device.

Accordingly, for at least the reasons set forth above, Taylor and Laity, taken alone or in combination, do not disclose, teach, or suggest the subject matter of claim 9.

Claim 9 is thus believed allowable in its present form.

Claim 32 is directed to a computer network, and recites, in part, a microprocessorless network adapter interconnecting said at least one host computer and said at least one peripheral device.

Taylor and Laity, taken alone or in combination, do not disclose, teach, or suggest a microprocessorless network adapter interconnecting at least one host computer and at least one peripheral device for substantially the same reasons as set forth above with respect to claim 1.

Claim 32 also recites, in part, wherein said microprocessorless network adapter is configured to provide power to said at least one peripheral device.

Taylor does not disclose, teach, or suggest wherein a wherein a microprocessorless network adapter is configured to provide power to at least one peripheral device, nor is it asserted as much.

Laity simply does not disclose, teach, or suggest wherein any network adapter, much less a microprocessorless network adapter, is configured to provide power to said at least one peripheral device.

Rather, Laity discloses that the hub end module is capable of supplying to each downstream USB port 500 mA for up to seven (7) low-power or high-power device class functions (col. 8, lines 57-60).

However, the Laity hub end module is not a network adapter.

Although Laity discloses a USB-to-Ethernet module 19 having an RJ-45 port 46 connected to an Ethernet LAN 48 (col. 5, lines 38-42, Fig. 1), Laity simply does not disclose, teach, or suggest that USB-to-Ethernet module 19 is configured to provide power to at least one peripheral device.

Accordingly, Taylor and Laity, taken alone or in combination, do not disclose, teach, or suggest wherein a wherein a microprocessorless network adapter is configured to provide power to at least one peripheral device, as recited in claim 32.

Accordingly, for at least the reasons set forth above, Taylor and Laity, taken alone or in combination, do not disclose, teach, or suggest the subject matter of claim 32.

Claim 32 is thus believed allowable in its present form.

Claim 33 is directed to a network adapter, and recites, in part, wherein said network adapter is microprocessorless; and wherein said network adapter is configured to provide power to at least one peripheral device.

Applicants respectfully submit that Taylor and Laity, taken alone or in combination, do not disclose, teach, or suggest the subject matter of claim 33 for at least the reasons set forth above with respect to claims 1 and 32.

Accordingly, for at least the reasons set forth above, Taylor and Laity, taken alone or in combination, do not disclose, teach, or suggest the subject matter of claims 1, 9, 32 and 33.

Claims 1, 9, 32 and 33 are thus believed allowable in their present respective forms, and Applicants respectfully request the Examiner to withdraw the rejection of claims 1, 9, 32 and 33 under 35 U.S.C. §103(a).

Claims 10-13, 18 and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over Taylor in view of Hirata, et al., U.S. Patent No. 6,727,952 B1 (hereinafter, Hirata).

Applicants respectfully request reconsideration of the rejection of claims 10-13, 18 and 19 in view of the following.

Hirata is directed to electronic devices having a common connector such as a USB (Universal Series Bus) connector which is adapted to connect the device commonly to a plurality peripheral devices (col. 1, lines 7-10). Hirata discloses that digital cameras are known which are settable in a sleep mode (energy saving mode) in which the data processing function is inactivated although the control function is activated in preparation for photo-graphing so as to minimize battery power consumption (col. 1, lines 21-26). A digital camera 10 includes an ASIC (Application Specific Integrated Circuit) 4 for performing various data processing operations; connected to the ASIC 4 is a microcomputer 30 for controlling the operation of the ASIC 4 and other circuits (col. 1, lines 56-60, Fig. 3).

In the sleep mode, power is supplied to the microcomputer 30, whereas the ASIC 4 is not energized to thereby save the power to be consumed. However, for the host computer 2 to recognize the digital camera 10 when the computer 2 is connected by the USB connector to the camera 10 as set in the sleep mode, the pull-up resistor 8 needs to be held energized at all times (col. 2, lines 8-14).

Applicants believe that claims 10-13, 18 and 19 patentably define Applicants' invention over Taylor and Hirata, taken alone or in combination, for at least the reasons set forth below.

Claim 10 is directed to a computer network, and recites, in part, a microprocessorless network adapter interconnecting said at least one host computer and said at least one peripheral device.

Applicants respectfully submit that Taylor does not disclose, teach, or suggest a microprocessorless network adapter interconnecting at least one host computer and at least one peripheral device for substantially the same reasons as set forth above with respect to claim 10.

Hirata also does not disclose, teach, or suggest a microprocessorless network adapter interconnecting at least one host computer and at least one peripheral device, nor does the Examiner assert as much.

Accordingly, Taylor and Hirata, taken alone or in combination, do not disclose, teach, or suggest a microprocessorless network adapter interconnecting at least one host computer and at least one peripheral device, as recited in claim 10.

Claim 10 also recites, in part, wherein said microprocessorless network adapter is configured to send said at least one peripheral device at least one command to go into a low-power sleep mode until said microprocessorless network adapter detects inbound data bound for said at least one peripheral device.

Taylor does not disclose, teach, or suggest the above mentioned subject matter of claim 10, nor does the Examiner assert as much. Rather, Hirata is relied on, in particular, at column 1, lines 21-26 and column 2, lines 8-11.

At column 1, lines 21-26, Hirata discloses that digital cameras are known which are settable in a sleep mode (energy saving mode) in which the data processing function is inactivated although the control function is activated in preparation for photo-graphing so as to minimize battery power consumption.

Applicants respectfully submit that a camera being settable in a sleep mode does not in any manner disclose, teach, or suggest a network adapter configured to send a peripheral device at

least one command to go into a low-power sleep mode, much less until the network adapter detects inbound data bound for at least one peripheral device, as recited in claim 10.

In contrast to claim 10, Hirata discloses a peripheral device in the form of a camera that itself may be settable in a sleep mode, without disclosing, teaching or suggesting that the camera is set into the sleep mode based on at least one command sent by a network adapter, as recited in claim 10.

In addition, the relied-upon passage in column 1 is silent as to remaining in the sleep mode until the network adapter detects inbound data bound for the at least one peripheral device, as recited in claim 10.

At column 2, lines 8-14, Hirata discloses that in the sleep mode, power is supplied to the microcomputer 30, whereas the ASIC 4 is not energized to thereby save the power to be consumed, but that for the host computer 2 to recognize the digital camera 10 when the computer 2 is connected by the USB connector to the camera 10 as set in the sleep mode, the pull-up resistor 8 needs to be held energized at all times (col. 2, lines 8-14).

However, the relied-upon passage in column 2 does not in any manner disclose, teach, or suggest that the camera is set into the sleep mode based on at least one command sent by another device, much less by a network adapter or a microprocessorless network adapter, as recited in claim 10.

In addition, the relied-upon passage in column 2 is silent as to the sleep mode remaining until the network adapter detects inbound data bound for the at least one peripheral device, as recited in claim 10.

In contrast to claim 10, the relied-upon passage in column 2 merely indicates that when in the sleep mode, the pull-up resistor needs to be held energized in order for the host computer to

recognize the digital camera. However, the camera is a peripheral, and the host computer is not microprocessorless, much a microprocessorless network adapter.

Further, there is no command sent by another device, such as a network adapter, that sets the Hirata camera in a sleep mode.

Accordingly, Taylor and Hirata, taken alone or in combination, do not disclose, teach, or suggest wherein the microprocessorless network adapter is configured to send the at least one peripheral device at least one command to go into a low-power sleep mode until the microprocessorless network adapter detects inbound data bound for the at least one peripheral device, as recited in claim 10.

Accordingly, for at least the reasons set forth above, Taylor and Hirata, taken alone or in combination, do not disclose, teach, or suggest the subject matter of claim 10.

Claim 10 is thus believed allowable in its present form.

Claim 11 is directed to a computer network, and recites, in part, a microprocessorless network adapter interconnecting said at least one host computer and said at least one peripheral device.

Applicants respectfully submit that Taylor and Hirata, taken alone or in combination, do not disclose, teach, or suggest a microprocessorless network adapter interconnecting at least one host computer and at least one peripheral device for substantially the same reasons as set forth above with respect to claim 10.

Claim 11 also recites wherein said microprocessorless network adapter is configured to at least one of send a wake-up command to said at least one peripheral device and verify an active status of said at least one peripheral device before accepting the inbound data.

Taylor does not disclose, teach, or suggest the above mentioned subject matter of claim 11, nor does the Examiner assert as much. Rather, Hirata is relied on, in particular, at column 4, lines 20-39.

At column 4, lines 20-39, Hirata discloses that a microcomputer 3 of camera 1 detects the connection of the host computer to camera 1 when host computer 2 is connected to camera 1 as set in the sleep mode, and that in response to the detection, microcomputer 3 brings camera 1 out of the sleep mode.

However, microcomputer 3 is part of camera 1, and hence, is not an external device, much less a network adapter or a microprocessorless network adapter, that is configured to at least one of send a wake-up command to camera 1 and verify an active status of camera 1, much less before accepting inbound data.

Rather, microcomputer 3 of camera 1 brings camera 1 out of the sleep mode so as to supply power to pull-up resistor 8 so that camera 1 may be recognized by host computer 2.

Accordingly, Taylor and Hirata, taken alone or in combination, do not disclose, teach, or suggest wherein a microprocessorless network adapter is configured to at least one of send a wake-up command to at least one peripheral device and verify an active status of the at least one peripheral device before accepting inbound data, as recited in claim 11.

Accordingly, for at least the reasons set forth above, Taylor and Hirata, taken alone or in combination, do not disclose, teach, or suggest the subject matter of claim 11.

Claim 11 is thus believed allowable in its present form.

Claim 12 is directed to a computer network, and recites, in part, a microprocessorless network adapter interconnecting said at least one host computer and said at least one peripheral device.

Applicants respectfully submit that Taylor and Hirata, taken alone or in combination, do not disclose, teach, or suggest a microprocessorless network adapter interconnecting at least one host computer and at least one peripheral device for substantially the same reasons as set forth above with respect to claim 10.

Claim 12 also recites, in part, wherein said microprocessorless network adapter is configured to perform automatic USB enumeration.

Taylor does not disclose, teach, or suggest the above mentioned subject matter of claim 12, nor does the Examiner assert as much. Rather, Hirata is relied on, in particular, at column 2, lines 3-7 and column 3, lines 16-20.

However, Applicants respectfully submit that the relied-upon Hirata passages pertain to realizing a hot plug function and recognizing a connection, and are completely silent as to USB enumeration, much less automatic USB enumeration. The Hirata disclosure simply does not address USB enumeration in any manner, much less automatic USB enumeration.

Accordingly, Taylor and Hirata, taken alone or in combination, do not disclose, teach, or suggest wherein a microprocessorless network adapter is configured to perform automatic USB enumeration, as recited in claim 12.

Accordingly, for at least the reasons set forth above, Taylor and Hirata, taken alone or in combination, do not disclose, teach, or suggest the subject matter of claim 12.

Claim 12 is thus believed allowable in its present form.

Claim 13 is directed to the network of claim 12, wherein said USB enumeration is performed without software.

Claim 13 is believed allowable due to its dependence on otherwise allowable base claim 12. In addition, claim 13 further and patentably defines the invention over Taylor and Hirata, taken alone or in combination.

For example, Taylor does not disclose, teach, or suggest the above mentioned subject matter of claim 12, nor does the Examiner assert as much. Rather, Hirata is relied on, in particular, at column 4, lines 9-14.

However, the Hirata passage at column 4, lines 9-14 pertains to realizing a hot plug function, and is completely silent as to USB enumeration, much less automatic USB enumeration performed without software. The Hirata disclosure simply does not address USB enumeration in any manner, much less automatic USB enumeration.

Accordingly claim 13 is believed allowable in its own right.

Claim 18 is directed to network adapter, and recites, in part, wherein said network adapter is microprocessorless; and wherein said application specific integrated circuit is configured to perform automatic USB enumeration.

Claim 18 is believed allowable in its present form for substantially the same reasons as set forth above with respect to claims 10 and 12.

Claim 19 is directed to the network adapter of claim 18, wherein said USB enumeration is performed without software.

Claim 19 is believed allowable due to its dependence on otherwise allowable base claim 18.

In addition, claim 19 further and patentably defines the invention over Taylor and Hirata, taken alone or in combination, for substantially the same reasons as set forth above with respect to claim 13.

Accordingly, for at least the reasons set forth above, Taylor and Hirata, taken alone or in combination, do not disclose, teach, or suggest the subject matter of claims 10-13, 18 and 19.

Claims 10-13, 18 and 19 are thus believed allowable in their present respective forms, and Applicants respectfully request the Examiner to withdraw the rejection of claims 10-13, 18 and 19 under 35 USC §103(a).

For the foregoing reasons, Applicants submit that no combination of the cited references teaches, discloses or suggests the subject matter of the appended claims, and that the appended claims are directed to statutory subject matter. The appended claims are therefore in condition for allowance, and Applicants respectfully request withdrawal of all rejections and allowance of the claims.

In the event Applicants have overlooked the need for an extension of time, an additional extension of time, payment of fee, or additional payment of fee, Applicants hereby conditionally petition therefor and authorize that any charges be made to Deposit Account No. 20-0095, TAYLOR & AUST, P.C.

Should any question concerning any of the foregoing arise, the Examiner is invited to telephone the undersigned at (317) 894-0801.

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